

CHARGE OF DISCRIMINATION

Michael White (814) 398-1871
 23285 Wilkie Road County of Crawford
 Cambridge Springs, PA 16403

Pennsylvania Department of Corrections (814) 756-5778
 SCI Albion
 ATTN: Personnel Agent - Henry Powell
 10745 Route 18
 Albion, PA 16475-0001 County of Erie

Number of Employees: 450-500

Cause of Discrimination Based On: Gender / Sexual Harassment

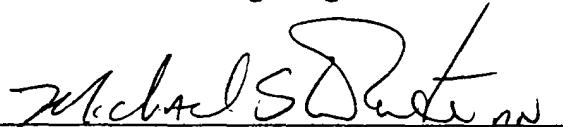
Date Discrimination Took Place:

Earliest: May, 1999 Latest: June, 2000

1. I have been an employee of the Respondent since July, 1993. I was employed as a Male R.N. for seven (7) years with the Respondent since 1993. Throughout the seven (7) years my performance was always exemplary. Judy Weyers / Nancy Felner with Respondent's support have been harassing me and discriminating against me because of my gender.
2. I am still employed as an R.N. The union refuses to help me.
3. I believe that the Respondent discriminated against me in violation of Title VII as to gender discrimination and the PHRA and also Sexual Harassment.
4. At all times I worked at Albion, Pennsylvania facility.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 10/22/00


 Michael White

Sworn and subscribed before me this
22 day of June, 2000.


 Notary

Notarial Seal	
Neal A. Sanders, Notary Public	
Center Twp., Butler County	
My Commission Expires March 22, 2001	

My Commission Expires:



AFFIDAVIT

I, Michael White, being first duly sworn upon my oath affirm and hereby say:

I have been given assurances by an Agent of the U.S. Equal Employment Opportunity Commission that this Affidavit will be considered confidential by the United States Government and will not be disclosed as long as the case remains open unless it becomes necessary for the Government to produce the affidavit in a formal proceeding. Upon the closing of this case, the Affidavit may be subject to disclosure in accordance with Agency policy.

I am 32 years of age, my gender is male, and my racial identity is white. I reside at 23285 Wilkie Road, Cambridge Springs, Pennsylvania 16403, (814) 398-1871, County of Crawford. My Social Security Number is 162-62-6695. My date of birth is October 22, 1967.

My statement concerns Pennsylvania Department of Corrections, SCI Albion, ATTN: Personnel Agent - Henry Powell, 10745 Route 18, Albion, Pennsylvania 16475-0001, (814) 756-5778, County of Erie.

My job classification at this time is R.N.

My immediate supervisor is Nancy Felner (R.N. Supervisor).

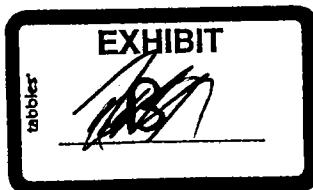
I. Relevant work history: I have been employed by Respondent since July, 1993. My position is R.N. I was unlawfully discriminated against because I am a male R.N. by Judy Weyers and Nancy Felner with support of upper management.

II. Coverage / Respondent's business: Respondent has more than enough employees for coverage. The Respondent's business is a correctional facility.

III. Personal harm: I was wrongfully discriminated against because of my gender (male) and Sexual Harassment on a continuous basis since 1999.

IV. Respondent's explanation: Unknown. This is merely a pretext for gender discrimination and Sexual Harassment.

V. Direct evidence: Claimant is investigating this matter. Circumstantial evidence will also be presented in support of my case for gender discrimination and Sexual Harassment.



VI. Witnesses:

Brenda Hale
Ed Oday
Doug Randall
John Quinlan
Henry Powell
and other names to be provided in the future.

VII. Comparators: This is being camouflaged / pretext. I will provide names as soon as possible.

VIII. Class harm: This is an individual harm charge.

IX. Remedy/relief: All remedies to which I am entitled by law.

X. Other information: I am represented by Neal A. Sanders, Esquire, 1924 North Main Street Extension, Butler, PA 16001. (724) 282-7771

I have read and had an opportunity to correct this Affidavit consisting of 2 typed pages and swear that these facts are true and correct to the best of my knowledge, information and belief.

Dated: 10/01/00

Michael White
Michael White

Sworn to and subscribed before
me this 22 day of June, 2000.

Neal A. Sanders
Notary

My Commission Expires: Notary Seal
Neal A. Sanders, Notary Public
Center Twp., Butler County
My Commission Expires March 22, 2001

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 9th day of September, 2005, a true and correct copy of the foregoing **Plaintiff's Brief in Opposition to Defendant's Motion for Summary Judgment**, was mailed by the United States First Class Mail, postage prepaid, to the following:

Craig Maravich, Esquire
Office of Attorney General
Commonwealth of Pennsylvania
564 Forbes Avenue
Manor Complex
Pittsburgh, Pennsylvania 15219

Dated: September 9, 2005

By: 

Neal A. Sanders, Esquire
Counsel for Plaintiff,
Brian Pierce

LAW OFFICES OF NEAL A. SANDERS
1924 North Main Street Ext.
Butler, Pennsylvania 16001

(724) 282-7771
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